

From: [Lancey, Susan](#)
To: [Gold, Ruth \(DEM\)](#)
Cc: [Bird, Patrick](#); [Aleida Whitney \(Aleida.whitney@dem.ri.gov\)](#)
Subject: RE: [EXTERNAL] : RE: Pyrolysis Application for medical waste treatment facility in Rhode Island
Date: Wednesday, January 29, 2020 2:41:00 PM
Attachments: [Medrecycler - BLOCK FLOW DIAGRAM REV 7.pdf](#)
[2015 final e-Cycling ADI.pdf](#)
[Aemerge Applicability Determination 2017_04_07.pdf](#)
[Aemerge RedPak Applicability Determination 2018_10_31.pdf](#)
[ETI USEPA Pyrolysis Letter.pdf](#)

Hi Ruth,

Thank you for the flow diagram for the medical waste treatment facility being planned in Rhode Island. Could you get us a more detailed written description about the unit and process that we can review to give us a better idea of whether the unit may be regulated under Part 60 Subpart Ec? The Part 60 Subpart Ec HIMWI rule has an exclusion for pyrolysis units, however, in the past we have taken a narrow view of units that qualify for this exclusion. We have issued several written determinations for units that describe themselves as pyrolysis units, but we found the units did not meet the definition of pyrolysis in the HIMWI rule. I am attaching a few determination letters about this issue.

Let us know if you have any questions. Thanks,

Susan Lancey

U.S. EPA New England

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Phone: (617) 918-1656

From: Gold, Ruth (DEM) <ruth.gold@dem.ri.gov>
Sent: Monday, January 27, 2020 12:25 PM
To: Bird, Patrick <Bird.Patrick@epa.gov>
Cc: Lancey, Susan <lancey.susan@epa.gov>
Subject: RE: [EXTERNAL] : RE: Pyrolysis Application for medical waste treatment facility in Rhode Island

Pat,

They did not mention any federal rules in the application.

Ruth A. Gold

Supervisor – Permitting

Office of Air Resources

RI Dept. of Environmental Management

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From: Bird, Patrick <Bird.Patrick@epa.gov>
Sent: Mon, 01/27/20 11:57 AM
To: Gold, Ruth (DEM) <ruth.gold@dem.ri.gov>
Cc: Lancey, Susan <lancey.susan@epa.gov>

Subject: [EXTERNAL] : RE: Pyrolysis Application for medical waste treatment facility in Rhode Island
Thanks, Ruth!

Do you have any information on the company's interpretation of applicability to 40 CFR Part 60 Subpart Ec? That's the piece I'm interested in teasing out.

Pat

Patrick Bird

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From: Gold, Ruth (DEM) <ruth.gold@dem.ri.gov>

Sent: Monday, January 27, 2020 11:39 AM

To: Bird, Patrick <Bird.Patrick@epa.gov>

Subject: Pyrolysis Application for medical waste treatment facility in Rhode Island

Hi Pat,

This is what I have electronically. If you need anything else, please let me know.

Good luck,

Ruth A. Gold

Supervisor – Permitting

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